



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

November 2, 2020

ECF and E-mail

The Honorable Alvin K. Hellerstein
United States District Judge
Southern District of New York
New York, New York 10007

**Re: United States v. Tareck Zaidan El Aissami Maddah, et al.,
No. 19 Cr. 144 (AKH)**

Dear Judge Hellerstein:

On October 21, 2020, Victor Mones filed a motion seeking relief in connection with alleged violations of the Government's obligations under *Brady v. Maryland*, 373 U.S. 83 (1963) and *Giglio v. United States*, 405 U.S. 150 (1972). At a pretrial conference on October 28, 2020, and in a subsequent Order docketed the same day, the Court denied Mones's motion without prejudice. On October 30, 2020, Mones moved to withdraw his guilty plea. Although the Government does not concede any *Brady* or *Giglio* violations, under the unique facts and circumstances of this case, the Government does not object to Mones withdrawing his guilty plea.

Respectfully submitted,

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